

DAHIYA LAW OFFICES LLC

Attorneys

75 Maiden Lane Suite 606
New York, New York 10038
Tel: 212-766 8000
karam@dahiya.law

Via: ECF

Hon. Judge John G Koeltl
District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

*Time to submit
July 25, 2022 opening brief extended
September 23, 2022. Time to
respond is October 21, 2022.
Time to reply is November 11, 2022.
GO ordered
7/25/22 CR 6/Koeltl/US D.J.*

Case No. 22-CV-03872

Bronx Miracle Gospel Tabernacle Word of Faith Ministries Inc.,
Appellant v Deborah J. Piazza, Appellee.

Dear Judge Koeltl,

I am the counsel for the appellant, Bronx Miracle Gospel Tabernacle Word of Faith Ministries Inc. (the “Church”) I am writing to request extension of time to perfect the pending appeal before this court. This is my **second** and the **last** request. Attached is the letter received from the Church asking for this Court’s kind consideration extending the time by three months.

Your Honor, on May 16, 2022, you had issued an order setting a timeline for submission of briefs by respective parties, i.e. opening brief appellant by June 13, 2022 and appellees to respond by July 5, 2022, which was subsequently amended by granting the appellant Church until July 29, 2022 to file the brief.

I am making a second and final request for extension of time by additional three months’ time. Your Honor, as I had stated in the earlier letter motion, the Church members and trustees have not been able to coordinate and effectively determine the future course of action for the Church, there is no final consensus on this issue. In interest of justice, as the Church has immensely suffered in the bankruptcy proceeding and now with no roof and or capital, it is dithering to survive. Disagreement within Church ranks is also adding to this situation. It has not been easy explaining to the Church members, the bankruptcy proceedings and related nitty-gritty of appeals.

Your Honor as I had stated earlier, the Church might not pursue this appeal at all, but for sake of reaching a consensual decision, they have asked me to approach the Court for a final allowance of time at least by three months’ time in interest of justice. Thanking the Court for its consideration.

Yours sincerely,

/s/karamvirdahiya

Karamvir Dahiya

Cc:VIA ECF Jill Makower, jmakower@tarterkrinsky.com for the appellee